

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: WELLPATH HOLDINGS, INC., et al.,  
Debtors)

Chapter 11

CASE NO. 24-90533 (ARP)

v.  
Arthur Lamont Henderson  
Creditor.

United States Courts  
Southern District of Texas  
FILED ALFRED R. PEREZ

DEC 10 2024

Nathan Ochsner, Clerk of Court

MOTION TO LIFT STAY ON CIVIL RIGHTS ACTION  
AND PERMISSION TO FREEZE DEBTOR(S) ASSETS

TO THE HONORABLE JUDGE, ALFRED R. PEREZ:

Now Comes, Arthur Lamont Henderson (creditor), a plaintiff in civil litigation against above debtor in civil action (2:23-cv-1224) (W.D. Pa.) and respectfully represents as follows:

1. On November 11, 2024, the debtor filed a Voluntary Petition for Non-Individuals filing Bankruptcy Code for Relief under Chapter 11 of title 11 in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, commencing case no. 24-90533.

2. Pursuant to section 362(a) of the Bankruptcy Code, the filing of the Voluntary Petition operates as a stay in lawsuits.

3. On November 15, 2024, WELLPATH HOLDINGS, INC. (debtor) filed a Motion for Bankruptcy and Notice of Stay in Civil Rights Action. (ECF 67).

4. On November 18, 2024, Magistrate Patricia Dodge in W.D. of Pa., ordered that civil action is Temporarily Stayed and Administratively Closed, pending further order of Court. (ECF 68).

5. On November 22, 2024, creditor received order suggesting CASE Temporarily Stayed and case closed.  
SEE: (order attached)

6. On November 25, 2024, creditor received Notice of Stay and suggestion of Bankruptcy from Counsel for debtor(s), and copy of order entered by Bankruptcy Judge, Alfred R. Perez.

7. The debtor failed to serve a copy of Interim Order on creditor within the (5) business days required from date of entry.

8. In the interest of a timely objection, and preservation of any rights or challenges the creditor may have, the creditor has filed this motion via express mail (overnight)

9. The creditor objects to the stay in civil litigation against debtor, and proclaims that his constitutional right to due process, and equal protection under the United States law, is being impeded.

10. The creditor intend to obtain a judgment that proves the debtor(s) intentionally, willfully, and maliciously injured creditor and attempted to conceal their actions through fraudulent documents and statements.

13. In the alternative, if the stay isn't lifted, the creditor intend to preserve his right to challenge any potential dischargeable debt under willful and malicious acts to injure in Bankruptcy proceedings.

12. Creditor suggests that he may be prejudiced by the Chapter ~~11~~ restructuring plan between debtor(s) and trustee.

13. Creditor suggests that Chapter 11 Bankruptcy filing by debtors may be in bad faith to discharge debt on possible debt.

14. Creditor contends that to liquidate property and/or assets without factoring in a successful challenge to dischargeable debt by creditor, creditor would be prejudiced from obtaining the amount of damages the creditor requested in civil rights action.

Wherefore, the creditor respectfully request that this Honorable Court lift Automatic Stay to allow creditor to proceed in his civil rights action; or schedule a hearing to allow creditor to challenge any proposed dischargeable debt; and freeze assets of debtor(s) in the amount of damages sought in Civil Rights action (\$5,000,000.00) until dispute between debtor and creditor is concluded.

Date: 11/27/2024

Respectfully Submitted

Arthur L. Henderson  
Arthur L. and T. Henderson (Creditor)  
#LID-3209  
SCF-Fayette, 50 Overlook Drive  
LaBelle, FL 15450

CERTIFICATE OF SERVICE

I, Arthur L. Henderson, hereby certify that on this date, a true and correct copy of the foregoing MOTION TO LIFT STAY AND PERMISSION TO FREEZE DEBTOR(S) ASSETS was sent by express mail to CLERK of United States Bankruptcy Court, and sent via first class mail to the following:

SAMUEL H. FOREMAN, Esq.  
WEBER GALLAGHER SIMPSON  
STAPLETON FIRS & NEWBY, LLP  
Four PPG Place  
5th Floor  
Pittsburgh, PA 15222

.. Jason M. Logue, Esq.  
DAVISS McFARLAND & CARROLL, P.C.  
OPE Gateway Center, 10th Floor  
Pittsburgh, PA 15222

Judge: Alfred R. Perez  
515 Rusk St.  
Houston TX 77002  
United States Bankruptcy Court  
Southern District of Texas

Date: 11/27/2024

Arthur L. Henderson  
Arthur L. Henderson  
[Pro se Creditor]

**Other Orders/Judgments**

2:23-cv-01224-AJS-PLD HENDERSON v. CORRECT CARE SOLUTIONS, INC. et al

**U.S. District Court**

**Western District of Pennsylvania**

**Notice of Electronic Filing**

The following transaction was entered on 11/18/2024 at 3:32 PM EST and filed on 11/18/2024

**Case Name:** HENDERSON v. CORRECT CARE SOLUTIONS, INC. et al

**Case Number:** 2:23-cv-01224-AJS-PLD

**Filer:**

**WARNING: CASE CLOSED on 11/18/2024**

**Document Number:** 68 (No document attached)

**Docket Text:**

**ORDER.** On November 15, 2024, Wellpath Holdings, Inc. filed a Suggestion of Bankruptcy and Notice of Stay (ECF 67). Its filing states that on November 11, 2024, Wellpath Holdings, Inc., on behalf of other identified debtors, including Wellpath, LLC (formerly known as Correct Care Solutions, LLC), filed a petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas. (In re Wellpath Holdings, Inc., No. 24-90533 (Bankr. S.D. Tex.)) (ECF 67-1). Pursuant to Section 362(a) of the Bankruptcy Code, the petition operates as a stay of all proceedings against the debtors. 11 U.S.C. 362(a). On November 12, 2024, the Bankruptcy Court issued an Amended Interim Order Enforcing the Automatic Stay that stayed in their entirety all lawsuits filed as of the Petition Date in which the debtor is named as one of the defendants, including the plaintiffs claims against the non-debtor defendants, on an interim basis, pending a hearing scheduled before the Bankruptcy Court on December 5, 2024. (ECF 67-2) Therefore, it is hereby ORDERED that this action is temporarily STAYED and ADMINISTRATIVELY CLOSED pending further order of this Court. Signed by Magistrate Judge Patricia L. Dodge on 11/18/2024. Text-only entry; no PDF document will issue. This text-only entry constitutes the Order of the Court or Notice on the matter. (mqe)

**2:23-cv-01224-AJS-PLD Notice has been electronically mailed to:**

Benjamin M. Lombard blombard@wglaw.com, jdamon@wglaw.com

Samuel H. Foreman sforeman@wglaw.com, jdamon@wglaw.com

Jason M. Logue jlogue@dmcpc.com, sartman@dmcpc.com

**2:23-cv-01224-AJS-PLD Filer must deliver notice by other means to:**

ARTHUR L. HENDERSON

LD-3209

SCI FAYETTE

50 Overlook Drive

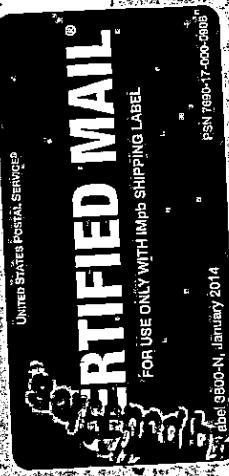
LaBelle, PA 15450

PRST-CLAS

Inmate Mail  
PA Department of Corrections

Arthur L. Monk / 1000000423209  
917 - Park Drive  
500 Willow Drive  
LaSalle, PA 15463

Mail Office  
Delivery  
Dec 10 2024  
Suburban  
Services Co.  
Suburban  
Services Co.



Attn: Judge Michael J.  
United States Bank  
Southern District  
Jackson, TX